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October 23, 2025

The Honorable Leonard P. Stark
United States District Court
District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, Delaware 19801**Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, Case No. 17-mc-151**Kevin J. Mangan
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Dear Judge Stark,

We write on behalf of Gold Reserve Ltd. (“Gold Reserve”). At the close of the hearing on October 21, 2025, Gold Reserve renewed its motion for a stay of these proceedings until the resolution of Gold Reserve’s pending motion for disqualification. Gold Reserve’s counsel asked whether, as Your Honor indicated at the October 20, 2025 hearing, the Court had come to a view about the timing and sequence of its forthcoming decisions on Gold Reserve’s disqualification motion and the Special Master’s Updated Final Recommendation. At the time, Your Honor said it had not reached a conclusion, but that it might “formulate a game plan” and share it with the parties in advance of the rulings. Your Honor also indicated that it would not issue a decision on the Updated Final Recommendation until briefing concluded next Tuesday.

Gold Reserve respectfully renews its request for a stay such that the Court first decides the disqualification motion and thus whether it has statutory authority to decide the Final Recommendation under 28 U.S.C. § 455. In the event the Court denies this request, Gold Reserve respectfully requests clarity as to whether the Court has reached a decision on any schedule and sequence for ruling on the disqualification motion and the Updated Final Recommendation.

Respectfully submitted,

Womble Bond Dickinson (US) LLP/s/ Kevin J. Mangan

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cc: Counsel of Record (via ECF)